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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TIFFANY ASHRAF,

Plaintiff,

v.

**NEVADA TITLE AND PAYDAY
LOANS, INC.,**

Defendant.

Case No.: 2:15-cv-01353-GMN-VCF

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION TO
COMPEL INDIVIDUAL
ARBITRATION OF PLAINTIFF'S
CLAIMS AND TO DISMISS THIS
ACTION OR, IN THE
ALTERNATIVE, TO STAY THIS
ACTION PENDING THE
COMPLETION OF ARBITRATION**

[FIRST REQUEST]

Plaintiff, TIFFANY ASHRAF (“Plaintiff”), and Defendant, NEVADA TITLE AND PAYDAY LOANS, INC. (“Defendant”), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Defendant’s Motion to Compel Individual Arbitration of Plaintiff’s Claims and to Dismiss this Action or, in the Alternative, to Stay this Action Pending the Completion of Arbitration (the “Motion”). The current deadline is set for August 10, 2015.

1. Plaintiff’s Complaint was filed on May 18, 2015, in the Eighth Judicial District Court for Clark County, Nevada.
2. Defendant removed the action to Federal Court on July 17, 2015. [Dkt. No. 1].
3. Defendant filed its Motion [Dkt. Nos. 7, 8 & 10] on July 24, 2015.
4. Plaintiff and Defendant have agreed to an extension of time of 14 days, up to and including August 24, 2015 for Plaintiff to respond to Defendant’s Motion.
5. Plaintiff and Defendant further agree that Defendant shall have 14 days from the date of Plaintiff’s Response to file a Reply.
6. This request is not made for purposes of delay, but rather to allow Plaintiff to fully brief the Motion brought by Defendant.

The parties therefore respectfully request this Court enter an order granting an extension of time of 14 days, up to and including August 24, 2015, for Plaintiff to respond to Defendant’s Motion, and allow Defendant 14 days from the date of

Plaintiff's Response to file a Reply.

DATED: August 10, 2015

BALLARD SPAHR LLP

KAZEROUNI LAW GROUP, APC

/s/ Ann Marie Hansen

/s/ DANNY J. HOREN

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IT IS SO ORDERED:

Plaintiff shall have 14 days, up to and including August 24, 2015, to respond to Defendant's Motion, and Defendant shall have 14 days from the date of Plaintiff's Response to file a Reply.


UNITED STATES DISTRICT COURT JUDGE

DATED: August 14, 2015

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained their authorization to affix their electronic signature to this document.

Dated: August 10, 2015

KAZEROUNI LAW GROUP

By: /s/ Danny Horen
DANNY HOREN, ESQ.
ATTORNEY FOR PLAINTIFF